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Attorneys for Defendant and Counterclaimant,
COMPANIA MEXICANA DE AVIACION, S.A.
DE C.V. D/B/A MEXICANA AIRLINES

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BIGFOOT VENTURES, LLC,
Plaintiff/Counterdefendant,
v.
COMPANIA MEXICANA DE
AVIACION, S.A. DE C.V. D/B/A
MEXICANA AIRLINES,
Defendant/Counterclaimant.

Civil Action No.:
08 CV 1357 BEN (JMA)

**APPLICATION FOR LEAVE TO
FILE DOCUMENTS UNDER
SEAL IN SUPPORT OF
DEFENDANT'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

Date: May 10, 2010
Time: 10:30 a.m.
Courtroom: 3
Honorable Robert T. Benitez

Pursuant to Civil L.R. 7.2 and 79.2(c), Defendant/Counterclaimant Compañía Mexicana de Aviación S.A. de C.V. d/b/a Mexicana Airlines (“Mexicana”) hereby moves this court for an Order permitting it to file under seal certain documents in support of Mexicana’s Motion for Partial Summary Judgment, which contain or refer to information that has been designated by one of the parties as confidential under the Protective Order entered by this Court on July 13, 2009.

Mexicana requests that the following documents be filed under seal:

1. Memorandum of Points and Authorities in Support of Mexicana’s Motion for Partial Summary Judgment;
2. Statement of Material Facts in Support of Mexicana’s Motion for Partial Summary Judgment;
3. Declaration of Jorge Goytortua in Support of Mexicana’s Motion for Partial Summary Judgment; and,
4. Declaration of Lauren Keller Katzenellenbogen in Support of Mexicana’s Motion for Partial Summary Judgment.

Mexicana will serve Plaintiff/Counterdefendant Bigfoot Ventures, LLC with a complete set of all the confidential materials, as well as file a complete set under seal and submit a courtesy copy of same to the Honorable Robert T. Benitez.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: March 30, 2010

By: s/Lauren Keller Katzenellenbogen

Michael K. Friedland

Lauren Keller Katzenellenbogen

Attorneys for Defendant and Counterclaimant,
COMPANÍA MEXICANA DE AVIACIÓN, S.A.
DE C.V. D/B/A MEXICANA AIRLINES

PROOF OF SERVICE

I hereby certify that on March 30, 2010, I presented the within
**APPLICATION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL IN
SUPPORT OF DEFENDANT'S MOTION FOR PARTIAL SUMMARY
JUDGMENT** to the Clerk of Court for filing and uploading to the ECF system
which will send notification to the following:

Marc G. Reich
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I declare under penalty of perjury that the foregoing statements are true
and correct.

s/Lauren Keller Katzenellenbogen
Lauren Keller Katzenellenbogen
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